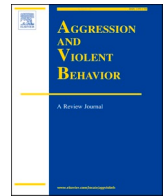




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# Sovereign citizens: A narrative review with implications of violence towards law enforcement

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## ABSTRACT

Extremist movements are growing in the United States. One concerning extremist group is that of sovereign citizens. Sovereign citizens have been labeled by the Federal Bureau of Investigation as a terrorist threat. Relative to other research about extremist groups, limited research exists about the sovereign citizen movement. The purpose of this article is to review all relevant literature concerning this movement, as it pertains to the threat posed to law enforcement, via descriptive research and to identify existing knowledge gaps. Most empirical work, about sovereign citizens, thus far has focused on legal matters, mental health, radicalization, and postdiction of targeted violence. The work presented here serves as a foundation for future research concerning this group.

## 1. Introduction

In 2013, a survey of law enforcement intelligence officers rated sovereign citizens as being the top serious terrorist threat, even higher than Islamic terrorists (Carter et al., 2014). Sovereign citizens are a loosely affiliated group of individuals whose primary belief is the illegitimacy of the United States (U.S.) government. They are antigovernment extremists who claim to be above the law and whose origins can be traced back to the Posse Comitatus, tax protestors and militias (Loeser, 2015). Their ideology often overlaps with other far-right extremist groups. They are mostly known for committing acts of paper terrorism, the practice of filing frivolous, pseudolegal claims. These claims involve large sums of money, and are often aimed at government officials, whom they believe have wronged them (Loeser, 2015).

Most concerning are the sovereign citizens who have committed violent acts. Two incidents, one in Bunkerville, Nevada, and another at the Malheur National Wildlife Refuge, show their proclivity for violence. They pose a unique and significant threat to law enforcement during traffic stops (Smith, 2019) because of their reluctance to follow basic traffic and motor vehicle laws. Upon being stopped for a traffic infraction, sovereigns can become argumentative, combative and non-cooperative. They will often engage in conflict-oriented tactics such as demanding that officers prove jurisdiction, refusing to answer questions or insisting that they “do not consent” to the actions of law enforcement. Another common tactic is when asked to roll down their vehicle’s windows, they will only crack the window, claiming that the window is broken. This makes communication difficult or impossible. Law

enforcement often has no choice but to break the window and physically remove them from their vehicles. These are long, protracted interactions that can and have become deadly. Lethal force may erupt resulting in the death of the sovereign citizen or the police officer. Specific examples, of the latter, include the 2010 killing of two West Memphis, Arkansas law enforcement officers (LEOs) by father and son sovereign citizens. Another sovereign citizen shot and killed a California Highway Patrol (CHP) officer after being pulled over for an obstructed license plate (KPIX, 2013).

Despite the problems and threats posed, the sovereign citizen literature base remains quite limited. The primary goal of this research is to provide a narrative review of the literature, to summarize what is known to date and to review the violence aimed at law enforcement by sovereign citizens. This work will not focus on sovereign citizen beliefs and ideology, as that has been extensively described elsewhere (cf. Berger, 2016; Parker, 2014; Sarteschi, 2020). Finally, implications of the current state of affairs and suggestions for future areas of research are included.

### 1.1. Prevalence and definitions

Accurate prevalence rates, of sovereign citizens, are difficult to ascertain largely due to a lack of government data. “Watchdog” organizations and education centers have seemingly been filling in the gaps, most notably the Anti-Defamation League (ADL), the Southern Poverty Law Center (SPLC), the Program on Extremism at George Washington University, and the National Consortium for the Study of Terrorism and Responses to Terrorism (START) headquartered at the University of

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Maryland. These groups have been tracking sovereign citizens for many years. A 2020 START research brief estimated that approximately 30% of all far-right extremists, in their Profiles of Individual Radicalization in the United States (PIRUS) database, "...are or were members of the sovereign citizen movement, antigovernment militias and/or express anti-government views" (Jensen, Yates, & Kane, 2020, p.2). The best estimates, indicate that in the U.S., there are approximately 300,000 to 500,000 sovereign citizens and their numbers are expected to grow (Southern Poverty Law Center, n.d.).

If government organizations are tracking sovereign citizens, information gathered may be classified and not available to the public. Recent reports indicate that the U.S. National Counterterrorism Center (NCTC) tracks domestic terrorism (Swan, 2019). Whether or not they track sovereign citizens is unknown. It would seem that both the Federal Bureau of Investigation (FBI) and the Department of Homeland Security (DHS) track sovereign citizens to some degree, given that they both offer detailed definitions of the group. The FBI defines sovereign citizens as "individuals who openly reject their US citizenship status, believe that most forms of established government, authority, and institutions are illegitimate, and seek, wholly or in part, through unlawful acts of force or violence, to further their claim to be immune from government authority. The mere advocacy of political or social positions, political activism, use of strong rhetoric, or generalized philosophic embrace of violent tactics may not constitute extremism and may be constitutionally protected" (Federal Bureau of Investigation, 2017, p.2). Their definition seemingly differentiates sovereigns who are in favor of violence versus those who actually commit violence in furtherance of their ideology.

The DHS definition is narrower and focuses only on sovereign citizen extremists which they define as "groups or individuals who facilitate or engage in acts of violence directed at public officials, financial institutions, and government facilities in support of their belief that the legitimacy of the U.S. citizenship should be rejected, almost all forms of established government, authority, and institutions are illegitimate and that they are immune from federal, state and local laws" (U.S. Department of Homeland Security, 2014, p. 1). The DHS seems focused on sovereign citizens who engage in violence, as opposed to those who may believe in violence philosophically, but who have yet to engage in violence.

This paper defines sovereign citizens in accordance with the FBI and the DHS. This paper also takes the position that any individual who is legally considered to be a citizen of the U.S. and who simultaneously believes that the U.S. is not a legitimate government, and as a result of that illegitimacy, believes themselves to be immune to all U.S. laws, is to be considered a sovereign citizen. These defined individuals may refer to themselves as something other than sovereign citizens and often do. One does not need to consider themselves a sovereign citizen to be a sovereign citizen. Other names sovereigns may call themselves include: freeman on the land, flesh and blood human being, natural man, free person, sovereign man, layman, a natural person, a freedom of common-law citizen, and other names. The core belief of sovereign citizens, is their proclaiming the American government to be illegitimate.

### 1.2. Profile of a sovereign citizen

Sovereign citizens are most widely known for paper terrorism. One set of researchers examined the financial crimes among members of the far-right extremist movement. Utilizing the U.S. Extremist Financial Crime Database, Sullivan et al. (2019) identified 215 schemes among 368 individual offenders. Of those 215 schemes, approximately one-third of their sample included sovereign citizens. Most of the sovereign citizens were middle-aged, white males living in the southern region of the U.S. (Sullivan et al., 2019).

An ADL special report from 2010, indicates that demographically, many sovereigns are white, middle-aged or older, with leaders being in their 60s or 70s. The biggest growth, according to the ADL, has occurred among African Americans, many of whom identify as Moorish sovereign

citizens, or Moors or Muurs. This particular movement is said to have accelerated since the 1990s, particularly in the East Coast areas of the U. S. (Pitcavage, as cited in Moorish sovereign citizens, n.d.; Parker, 2018).

There exists very little research concerning Moorish sovereign citizens. There are only two articles, one by Parker (2018) and Dew (2016). Parker (2018) discusses the beliefs of Moors and his interactions with them, as a competency evaluator for the court system. Dew (2016) traces the history of the Moorish Science Temple of America (MSTA), a religious sect that has existed since 1913, that is sometimes co-opted by Moorish sovereign citizens as attempted cover for their illegal activities. MSTa leaders take issue with the sovereign citizens Moors, for their fraudulently claiming to be members of their sect (NBC Washington, 2017). One of the biggest differences between Moorish sovereign citizens and non-Moorish sovereign citizens, is that Moors believe that they were the first inhabitants in America. This is used as a rationale for their belief that they are entitled to special privileges such as immunity from U.S. laws and not having to register their vehicles. Non-Moorish sovereign citizens, also believe they are entitled to special privileges.

Moors are more organized than their non-Moor, sovereign citizen counterparts. They tend to commit different types of crimes, though there are commonalities. Though their rationales may differ, both Moors and traditional sovereign citizens believe they are above the law.

In 2017, the FBI produced its first intelligence report analyzing acts of violence involving individuals in both the sovereign citizen extremist movement and the black identity extremist (BIE) movement. They focused on six attacks occurring since 2014, four of which they judged to be influenced by a mix of the two movements. Some governments refer to this combination as blended extremists (New Jersey Office of Homeland Security and Preparedness, 2016). Essentially, a BIE is defined as an individual who is motivated to commit violence "in response to perceived racism and injustice in American society..." (Federal Bureau of Investigation, 2017, p.2). The FBI noted that generally BIE violence is rare but felt it was important to warn law enforcement against this violence. The FBI was criticized for its identification of BIEs and has since stopped using the BIE label (Tau, 2019).

### 1.3. The sovereign citizen movement spread to other countries

Though the focus of this article concerns sovereign citizens in the U. S., it is important to acknowledge that it is a worldwide phenomenon. Sovereign citizens have been tracked in Canada, United Kingdom, Scotland, Republic of Ireland, Northern Ireland, New Zealand, and South Africa (Netolitzky, 2018). More recently, there is evidence that the sovereign citizen movement is present in several other countries. In Australia, for instance, a leaked 2015 counterterrorism report indicated that there were approximately 300 sovereign citizens in New South Wales (NSW) and that they should be considered a ... "potential terrorist threat" (Baldino & Lucas, 2019, p.251). Sovereigns in Australia, much like in Canada, call themselves "freeman on the land," and a number of political candidates have made claims and have utilized tactics seemingly consistent with the sovereign citizen movement (Baldino & Lucas, 2019). In June 2020, four members of a sovereign group "New West-ralia" broke into a historic courthouse and took up residence (Hedley, 2020). Social media posts indicated that their goal was to establish themselves as the "proper governing body of law for Western Australia" (Hedley, 2020, para. 7).

In another example involving Australia, Mark Pyteltek, a well-known sovereign citizen and his wife, were running a Facebook group crusading against a new rule mandating flu vaccines for those who were visiting individuals in aged care homes (Wilson, 2020). The couple was selling an online service that charges a fee to add their name to a form letter titled "Vaccine Non Consent Document Creator" to be sent to Australian officials (Wilson, 2020). In addition, they are also encouraging users to pay \$69.99 annually for access to a website called Solutions Empowerment that teaches sovereign rights and other secret strategies (Wilson, 2020). Mr. Pyteltek has a record of legal trouble with authorities in

Australia.

In a video from Singapore, dated May 2020, there appears to be a sovereign citizen female yelling “I am not a person, I am sovereign” when confronted by police for refusing to wear a mask in public and for breaching safe social distancing measures, under COVID-19 regulations (Koay, 2019). In Russia, individuals calling themselves “citizens of the U.S.S.R.” or “soviet citizens” are claiming they do not have to follow the laws of the Russian federation nor do they recognize it as a legitimate legal body (Luxmoore, 2019). Much like the sovereign citizen movement in the U.S., many “soviet citizens” are learning how to supposedly evade laws via the internet. YouTube, in particular, has channels with thousands of followers (Luxmoore, 2019). One popular channel claims to offer “practical tips and advice for citizens of the USSR” in how they can “legally avoid paying off debt” (Luxmoore, 2019, para. 14). That video, as of May 2019, had 2.8 million views (Luxmoore, 2019).

Germany’s version of the sovereign citizen movement is known as Reichsbürgers or the Reich Citizens movement. Estimated to number approximately 19,000 individuals, across the country, they believe the laws of both Imperial Germany and Nazi Germany still apply (The Sun, 2020). They also print their own passports, refuse to pay taxes and engage in paper terrorism (Gauvey Herbert, 2020). Some are prone to violence. Former Minister Germany, Adrian Ursache, a prominent member of the Reich Citizens movement, shot and killed a police officer in 2016. He had declared his property an independent state and when police tried to evict him from his “independent state” he attempted to kill them (The Sun, 2020). Two months later, one of Ursache’s followers, Wolfgang Plan, shot at police as they attempted to remove his weapons. One officer died and two officers were injured during the incident. Mr. Plan was sentenced to life in prison.

One exceptional Reichsbürger case is that of Peter Pitzek. He refers to himself as the King of Germany, and claims dominion over 1300 subjects (Gauvey Herbert, 2020). He was able to convince dozens of individuals to live on a compound in Wittenberg, Germany. They all gave him money, some their entire life savings. He amassed millions of dollars. He opened his own bank and was collecting deposits until German authorities shut it down. Upon investigation, the authorities were only able to locate a small amount of money on his property. Investigators concluded that the self-proclaimed King of Germany had spent most of the money on himself, in the form of travel, cars and real estate. The rest, they estimated, had been laundered through a network of companies and then hidden in countries that lacked extradition treaties with Germany. He went to trial and was convicted. None of the money was ever recovered. After about a year in prison, an appeals court overturned his conviction. No longer incarcerated, he has since acquired new money-making ventures. More than 70 companies, for a fee, have incorporated in his kingdom. Much like in Australia, members of the far-right political establishment in Germany have been adopting some of the language of the Reichsbürger movement, suggesting that these ideas have gone mainstream. German authorities have been trying to crack down on the illegal activities of the Reichsbürgers, but only with limited success (Gauvey Herbert, 2020).

#### 1.4. Where do individuals learn about the movement?

Sovereign citizen-hood is spread via the Internet, particularly on YouTube. There are millions of videos on the topic. The sovereign citizen message is also spread through jails and prisons, typically via mailers and word of mouth. *The Marshall Project* described a sovereign citizen scheme operating in prisons. Legitimate-sounding companies claim that the U.S. government is holding all prisoners for financial reasons and that for an initial fee of \$4000, they will initiate a bond process that will ultimately earn a prisoner their freedom (Thompson, 2019). Bond process, also known as straw man, redemption or accepted for value schemes, involve the use of fraudulent financial documents that appear legitimate (FBI, n.d.). Many unsuspecting victims find out, after the fact, that the bond process is simply an illegitimate money-making scheme.

A number of high-profile individuals have attempted to use sovereign citizen strategies in courts, but none have been successful. One example is Jared Fogle, the former spokesperson for the *Subway* sandwich restaurant chain, who declared himself a sovereign citizen in court filings. In one instance, he was attempting to correct an “error” regarding subject matter jurisdiction, essentially questioning the court’s authority to render a verdict (Bever, 2017). Mr. Vogel pled guilty, in 2015, for receiving child pornography and for traveling and attempting to elicit sexual conduct with a minor. He was sentenced to 15 years in federal prison (Bever, 2017). All of his sovereign citizen arguments have been deemed frivolous and rejected by the court (Evans, 2017).

Some learn about the many supposed advantages of sovereign citizen-hood via a number of gurus peddling seminars, promising the ability to emancipate oneself from the federal government (Pitcavage, 2012). For instance, *The New York Times* profiled Sean David Morton, a sovereign citizen who taught workshops claiming instant debt relief from mortgages, tax bills and student loans (Powers, 2019). David Wynn Miller, another tax protester/sovereign citizen guru, and his adherents, claimed that the government cannot tax their income because they are individuals without citizenship and thus are sovereign unto themselves (United States v. Kriemelmeyer, 2006). Mr. Wynn Miller went a step further than many other gurus and invented his own dialect called “In the Truth.” This dialect, he claimed, is based on mathematics, and is characterized by an overuse of prepositional phrases, hyphens, and colons and avoids the use of verbs, pronouns, adjectives, and adverbs (United States v. Kriemelmeyer, 2006). Mr. Wynn Miller has since passed away but his tactics live on and are attempted by other sovereign citizens.

#### 1.5. The radicalization of sovereign citizens

Carson et al. (2019) traced the evolution of the radicalization of Jerry Jr. and Joseph Kane, the father and son responsible for the killing of the aforementioned two West Memphis, Arkansas police officers in 2010. Jerry Kane had lost a child to sudden infant syndrome (SIDS) and became angry at the government after they insisted upon an autopsy. He subsequently became involved with the Dorean group, a company much like Sean David Morton’s company, who offered seminars about debt relief and gaining freedom from government. Mr. Kane initially was a strong supporter of the Dorean group, promoting their materials, but that changed after experiencing a number of legal problems. He eventually quit the group and started his own seminars. His seminars often included his advocating extreme violence, including the killing of Internal Revenue Service (IRS) agents. His violent rhetoric prompted the FBI to open an investigation. He increasingly has had more run-ins with law enforcement. His son Joseph took a similar stance against the government. Even as a young child, he had trouble with the law and was known to be disrespectful, problematic and defiant (Carson et al., 2019).

Joseph, then 16, was with his father on the morning of May 20, 2010, when they were pulled over for having unusual license plates (Dewan & Hubbell, 2010). While his father was speaking with officers, Joseph acquired his assault rifle and began shooting, killing both officers. The Kanes then fled the scene and were later killed in a gunfire exchange with police.

Taking a standardized approach to understanding the intension to carry out individual acts of targeted violence, Challacombe and Lucas (2019) evaluated whether the Terrorism Radicalization Assessment Protocol (TRAP-18) could retrospectively predict violence among a group of sovereign citizens. The TRAP-18 is comprised of eight warning behaviors and 10 distal characteristics, essentially combining the work of threat assessment and psychosocial factors associated with lone actor violence (Meloy & Gill, 2016). Their sample consisted of 58 individuals from the U.S. associated with the sovereign citizens movement between 2004 and 2014. It was determined that 30 individuals or groups had planned or committed violent or dangerous actions and 28 individuals were judged to have engaged in nonviolent criminal actions. Their



results indicated that the TRAP-18 measure successfully distinguished between sovereign citizens who were violent from those who were not. The researchers found that individuals with higher TRAP-18 scores were two times more likely to be involved in committing an act of violence compared to those with lower scores. Six warning behaviors (pathway, identification, novel aggression, energy burst, leakage, and last resort) and four distal behaviors (personal grievance, framed by ideology, greater creativity, and criminal violence) significantly postpredicted violence in their research (Challacombe & Lucas, 2019).

### 1.6. Mental health

For those unfamiliar with sovereign citizens, their behavior can seem odd, bizarre, confusing, and seemingly indicative of mental illness. This may explain why judges, after dealing with their disruptive behavior in the courtroom, frequently request mental health evaluations, to determine competency. In the literature, there are four studies to date, regarding the mental health of sovereign citizens and their fitness to stand trial. All of them seem to suggest that the vast majority of sovereign citizens are not mentally ill and are competent to stand trial.

Pytyck and Chaimowitz (2013) took a case study approach, while analyzing two cases of sovereign citizens who were referred to the court for mental health assessment. One was a male and one was a female. In both cases, they refused to cooperate with officers before their arrests and were uncooperative in court, thus prompting their competency evaluations. Both were deemed competent to stand trial. The authors argue that, in their view, the majority of sovereign citizens are not psychotic and are fit to stand trial.

Parker (2014) conducted a retrospective study regarding competence among sovereign citizen defendants undergoing psychiatric evaluations. In this study, he reported the results of nine cases of individuals, identified as sovereign citizens, who were court-ordered to undergo evaluations of competence to stand trial. Of the nine, three refused to participate in clinical interviews. Their average age was approximately 39 years old, had at least a high school education. The majority were African-American and eight of the nine defendants were male. Though two of the six had histories of mental health treatment, none showed significant cognitive deficits or had any history of psychosis. One defendant received a diagnosis of delusional disorder and another for depression. Three received diagnoses of substance abuse disorders; one had no diagnosis. The defendant who received the delusional disorder diagnosis was deemed incompetent to stand trial, however, Parker later came to believe that this defendant did not truly meet the criteria for delusional disorder and was competent to stand trial. In his view, those who adhere to the sovereign citizen belief system are mostly likely not delusional and are instead, exhibiting an extremist political philosophy. Parker argues that being a sovereign citizen alone is not enough to warrant a mental health diagnosis or a judgment of incompetence (Parker, 2014).

Parker reiterated that same sentiment in his 2018 review of a Brooklyn-based study of sovereign citizens in court. Paradis et al. (2018) retrospectively reviewed 36 criminal cases of sovereign citizens who had undergone competency evaluations. Much like the 2014 Parker study, most of their sample was middle-aged, reasonably well-educated, African-American, and male (Parker's study had one female). Six of the 36 claimed to be Moors or Muurs, a subgroup of sovereign citizens who hold different beliefs but who engage in many of the same illegal tactics. Consistent with Parker's, 2014 findings, none of the Brooklyn sample of sovereign citizens were psychotic and the majority were deemed competent to stand trial. The four studies available, thus far, support the notion that the majority of sovereign citizens are not diagnosably mentally ill or unfit to stand trial. Sovereign citizens who are diagnosably ill and thus unfit to stand trial, are the exception rather than the rule. More research is needed to understand why sovereign citizens adopt such extremist beliefs.

### 1.7. Legal response to sovereign citizens

A good deal of information about sovereign citizens was found in legal review articles. Four legal articles were identified through this review. Perhaps one of the most cited articles, in U.S. legal opinions, was by Loeser (2015) which provides a thorough examination of sovereign citizens as paper terrorists, the problems they cause in the courtroom and the danger they pose to public officials. Loeser (2015) recommends a number of legal and educational solutions for stopping the sovereign citizen threat including deterrence through effective punishment, pre-filing injunctions, procedural justice, online activism, and education about the history of government. Likewise, the remaining articles (Kalinowski, 2019) educate the reader about the nature and beliefs of sovereign citizens, in addition to examining the rationale for why sovereign citizens often wish to represent themselves in court (Phillips, 2016).

The most expansive and thorough article was that of Netolitzky (2018), who serves as the Complex Litigant Management Council for Canada's Alberta Court of Queen's Bench. One might consider it a seminal article on the phenomenon of pseudolaw. Netolitzky (2018) examines the origins, beliefs and patterns of pseudolaw, arguing that understanding the reasoning and motives behind sovereign citizen tactics provides valuable psychological insight. He speculates that the key to deterring sovereign citizens, and those with related ideologies, might lie in emphasizing deradicalization and reintegration strategies, much like those used with Islamic extremists (Netolitzky, 2018).

### 1.8. Sovereign citizen threat to law enforcement

Sovereign citizens are hazardous to law enforcement but how much and under what circumstances are not well understood. One study by Gruenewald et al., 2016, examined cases of LEOs killed by far-right extremists. Of the 30 cases, 40% were perpetrated by either antigovernment offenders or those who were sovereign citizens, though the researchers did not specify which of the 40% were sovereigns and which were merely labeled antigovernment. Their analysis also revealed that the family members of sovereigns often share the same belief system, are typically armed and may be willing to use deadly violence against law enforcement (Gruenewald et al., 2016).

## 2. Method

In an effort to examine that threat more closely, open-source information was searched to capture instances when: 1) sovereign citizens attempted to harm, did harm or who killed LEOs; and 2) sovereign citizens who threatened to harm LEOs. The focus on all forms of violence directed at police, including those who make threats, was collected in an attempt to gain a fuller picture of the dangers faced by LEOs from sovereign citizens. Sierra-Arévalo and Nix (in press), for instance, found that between 79 and 86% of firearm assaults on police do not result in the death of an officer. Focusing on only the most extreme cases, risks underestimating the full scope of dangers associated with policing (Sierra-Arévalo and Nix, in press). Cases were searched for in the following locations and outlets: Google alerts, law enforcement press releases, social media, Anti-Defamation League (ADL) reports, Southern Poverty Law Center (SPLC) reports, the Global Terrorism Database developed by The National Consortium For The Study of Terrorism and Responses To Terrorism (START) at the University of Maryland, the personal website kept by Daryl Johnson, former U.S. federal intelligence analyst for the Department of Homeland Security, the Center for Investigative Reporting, and the personal website of J.J. McNabb, a journalist who closely tracks the criminal acts of sovereign citizens and members of other extremist organizations. Also searched was the legal database LexisUni, which curates and archives legal news and court cases.

**Table 1**  
Successful and unsuccessful sovereign citizen violence towards police.

Date	State	Name	Circumstances	No. of casualties
1. Feb/June 1983	North Dakota/ Arkansas	Gordon Kahl	2 different armed standoffs	3 officers killed; 4 officers wounded
2. October 1993	Alabama	George Everette Sibley and Linda Lyon-Block	Parking lot attack	1 officer killed
3. June 1995	Ohio	Michael Hill	Traffic stop attack	1 officer killed
4. September 1995	Connecticut	Ed Thrall	Fired gun at police during standoff	0 officers wounded
5. January 1996	Ohio	Larry Martz	Traffic stop attack; assaulted officer	1 officer wounded
6. February 1996	Louisiana	Lynn Truman Crawford	Standoff after attempted arrest, suspect had gun	1 officer wounded by suspects dog
7. August 1997	Connecticut	Carl Drega	Traffic stop attack	2 officers killed; 3 officers wounded
8. September 1997	Idaho	Craig and Doug Brodrick	Traffic stop attack	1 officer killed; 1 officer wounded
9. December 1999	Texas	John Joe Gray	Accused of biting a state trooper	1 officer wounded
10. August 2002	Ohio	Donald Matthews	Traffic stop attack	1 officer killed
11. July 2003	Michigan	Scott Woodring	Armed standoff; shot state trooper after ordered to come out of vehicle	1 officer killed
12. December 2003	South Carolina	Arthur Bixby (and family)	Armed standoff over land	2 officers killed
13. March 2008	Wisconsin	Robert Bayliss	Fired at officers during eviction	0 officers wounded
14. May 2010	Arkansas	Jerry and Joseph Kane	Traffic stop attack	2 officers killed
15. June 2010	Florida	Brody James Whitaker	Fired shots at officers during police chase	0 officers wounded
16. September 2010	Texas	Victor White	Officers shot during violent confrontation	3 officers shot and wounded
17. June 2011	Arizona	William Foust	Suspect attempted to wrestle officer's taser from him	1 officer wounded
18. June 2011	North Dakota	Rodney Brossart	Suspect's sons pointed guns at officers attempting search warrant, female family member physically hit an officer	0 officers wounded
19. July 2011	Texas	James Michael Tesi	Shot officer during traffic stop	1 officer wounded
20. August 2012	Louisiana	Terry Smith, Brian Lynn Smith (and others)	Ambushed officers inside trailer	2 officers killed; 1 officer wounded
21. September 2012	California	Christopher Boone Lacy	Traffic stop attack	1 officer killed
22. October 2012	Tennessee	Tabitha Gentry	Tried to run over officers during traffic stop	2 officers wounded
23. October 2012	New Mexico	Tod Bartels	Suspect gets out of vehicle, started ramming patrol vehicles with it, then slammed a state patrolman's hand in his Jeep door during attempted arrest	2 officers wounded; injuries unclear
24. November 2012	Indiana	Derrick Berry	Attacked officers during step-son's traffic stop; claimed had supreme authority to kill police officer	Injuries unclear
25. December 2012	Idaho	Mitchell Lee Walck	Shooting at Idaho State Trooper	0 officers wounded
26. February 2013	New York	Carl Clark	Rammed stolen vehicle into police vehicle	1 officer wounded
27. March 2013	Florida	Jeffrey Allen Wright	While attempting to arrest him for counterfeiting charges, he barricaded himself in his garage, saying that he would not be "a servant to a king;" suspect fired a shot and pointed gun at SWAT officers	0 officers wounded
28. June 2013	Colorado	Lewis Pollard	During an attempt to serve a warrant, suspect started yelling at them from inside home, pulled out a semi-automatic handgun and pointed it at police, prompting their use of deadly force	0 officers wounded
29. August 2013	California	David McCormick	Assaulted coast guard officer who boarded his vessel	1 officer wounded
30. December 2013	South Carolina	Christopher Reames	Traffic stop attack	2 officers shot and wounded
31. March 2014	Ohio	Israel Rondon	Shot at police during eviction (previous conviction of assaulting an officer)	0 officers wounded (during shoot out); 1 officer wounded during previous assault
32. March 2014	Ohio	Monica Greer Justice	Assaulted officer during an arrest for a warrant	1 officer wounded
33. May 2014	Alaska	Arvin & Nathaniel Kangas	Officers shot during violent confrontation	2 officers shot and wounded
34. May 2014	Texas	Harvey Leelance Searcy	Assaulted police officer	1 officer wounded
35. June 2014	Georgia	Dennis Marx	Officer shot outside courthouse by suspect armed with an assault rifle, grenades, various kinds of ammunition, his own water supply, flexible handcuffs, body armor and a gas mask	1 officer shot and wounded
36. June 2014	Nevada	Jared and Amanda Miller	Ambushed officers eating in restaurant	2 officers killed
37. June 2014	Florida	Dustin Heathman	Fired at officers while they were trying to serve a warrant	0 officers wounded
38. June 2014	California	Brent Douglas Cole	Disagreement with federal Rangers on Bureau of Land Management property	2 officers shot and wounded
39. June 2014	Oregon	Earl Cranston Harris	Suspect retreated to bedroom and acquired a shotgun during eviction. After refusing to put down gun, deadly force was used	0 officers wounded
40. July 2014	Ohio	Tyshawn Hancock	Probation officer shot while attempting arrest	1 officer shot and wounded
41. August 2014	Texas	Douglas Leguin	Ambushed officers (and fire rescue) responding to fire call	0 officers wounded
	Florida	Curtis Wade Holley	Set fire to house with intent to ambush first responders	

(continued on next page)

Table 1 (continued)

Date	State	Name	Circumstances	No. of casualties
42. November 2014				1 officer killed; 1 officer shot and wounded
43. December 2014	Florida	Robert Lawrence	Suspect killed by officer following a scuffle outside animal shelter; refused to produce driver's license during attempt to leave stray dog. During scuffle with police, suspect grabbed taser from officers and was attempting to use it on them. Officers determined he was an immediate threat and deadly force was used	Injuries unclear
44. February 2015	Florida	Joseph Paffen	Opened fire on a vehicle containing four deputies inside	1 officer shot and wounded; 1 officer wounded with flying glass
45. March 2015	Minnesota	David Blanshan	Suspect resisted arrest during traffic stop	1 officer wounded
46. March 2015	Missouri	David Michael Hagler	Had discussed plans to kill police; booby-trapped his two side-by-side homes "inside and out" meant to endanger the lives of police	0 officers wounded
47. August 2015	Georgia	Dustin Lee Gunnells	During a struggle to remove suspect from vehicle, reached for gun multiple times during traffic stop	1 officer wounded
48. November 2015	Arizona	Paul Tice	He and his sons are known for having repeated confrontations with police; during one instance, officers attempted to pull him over, but he would not stop. When he eventually did, he placed a handgun on the dashboard, a move that was interpreted as an act of intimidation aimed at arresting officers	0 officers wounded
49. May 2016	Missouri	Marcus Paden	Assaulted officer during traffic stop	1 officer wounded
50. July 2016	Louisiana	Gavin Long	Ambushed officers	3 officers killed; 3 officers shot and wounded
51. August 2016	Maryland	Korryn Gaines	Pointed gun at police and threatened to kill them if they did not leave. They were attempting to serve arrest warrant for failing to appear in court	0 officers wounded
52. September 2016	Arizona	Marc Payne	Attempted to run over three officers with vehicle	3 officers wounded
53. September 2016	Texas	Moses King	Tried to speed away during traffic stop, ramming car into two squad cars, nearly hitting officers, then again tried to hit officers with car	0 officers wounded
54. September 2016	Michigan	Richard Parent	Sped away from traffic stop, led officers on a chase during which officer was wounded; suspect got out of vehicle and went into firing stance with handgun pointed at officers	1 officer wounded
55. September 2016	Louisiana	James Webb	Reached for firearm during traffic stop	0 officers wounded
56. January 2017	Florida	Markeith Lloyd	Shot officer during gun battle in supermarket parking lot	1 officer killed
57. June 2017	Tennessee	Alexander Ray Johnson	Traffic stop attack; suspect bit officer's tip of his thumb off	2 officers wounded
58. August 2017	Florida	Everett Glenn Miller	Officers shot during routine check	2 officers killed
59. August 2017	Indiana	John Jones Bey	Shot at three officers during eviction	0 officers wounded
60. September 2017	California	Vincent Hernandez	Shot at officers during eviction	0 officers wounded
December 2017	North Carolina	Shane Allen Grant	Shoved officer trying to flee traffic stop	1 officer wounded
61. February 2018	Georgia	Tierre Guthrie	Officer shot while serving warrant	1 officer killed; two officers wounded
62. March 2018	New Jersey	Sean Shaw	Combative with officers during traffic stop, striking one officer with close fists	1 officer wounded
63. March 2018	Minnesota	Melody Gray & Domonique Crayton	Pointed gun at officer's head during instance when officers tried to assist car in ditch, pulled the trigger but bullet did not come out	0 officers wounded
64. May 2018	Wyoming	David Wolosin	Officer shot while responding to suspect teaching infant to drive a vehicle	1 officer shot and wounded
65. July 2018	Oklahoma	John Terry Chatman	Suspect shot officer during arrest at a local Quik Trip	1 officer shot and wounded
66. December 2018	Pennsylvania	Janay Rebecca Smith	Officer dragged by suspect's car	1 officer wounded
67. February 2019	Minnesota	Dennis Duane Vann	Traffic stop where suspect specifically said he would kill multiple officers; recovered "pig-shaped" explosive device in RV vehicle that had "(expletive the police)" written on it	0 officers wounded
68. June 2019	Wisconsin	Davarius Riggins	Officers attacked while protecting domestic violence victim	4 officers wounded
69. September 2019	Oregon	Gregory Lee Rodvelt	Booby-trapped home with explosives, FBI agent shot in leg by rigged wheelchair/Ambush	1 officer shot and wounded
70. September 2019	Missouri	Chad Lee Moore	Officer attacked during arrest	1 officer shot and wounded
71. January 2020	Oklahoma	Sammie Markeith Young	Tried to run over officer with vehicle at traffic stop	0 officers wounded
72. January 2020	Ohio	Derrick J. Lewis	Suspect shot at officers three times during 13-h standoff	0 officers wounded
73. May 2020	Oregon	Caleb Zink	Officer bit on hand by suspect resisting arrest	1 officer wounded
74. July 21, 2020	Ohio	Monica Greer Justice	Barricaded self in home after police came to serve a warrant for a mental health evaluation	2 officers shot and wounded

### 3. Results

Table 1 shows that of the 75 instances in which sovereign citizens attempted to harm or did harm LEOs, there were 27 LEOs killed by sovereign citizens between 1983 and July 2020. Officers killed at traffic stops, accounted for eight of the 27 (30%) deaths. Eight officers (30%) were killed during ambushes, six officers (22%) were killed during police standoffs, four officers' (15%) deaths occurred while doing routine checks or serving a warrant, and one officer (3%) was killed in a gun battle in a grocery store parking lot.

Aside from the 27 deaths, there were an additional 65 LEOs who were wounded. Many of the sites of the violence were traffic stops, ambushes, courthouses, parking lots, and others. Examples of the violence, ranged from a police officer who had his thumb bitten off, to an officer shot and wounded at a gas station. In another incident, December 2018, a sovereign citizen was pulled over for failing to come to a stop at multiple stop signs. Upon requesting her driver's license, the driver stated that she did not need a license because she was not "trafficking goods nor at commerce," a common claim among sovereign citizens (*Pennsylvania v. Smith*, 2020, para. 3). She did provide a self-created identification card and claimed to be an American National. After questioning the officer's authority, she was asked to exit her vehicle, a request that she refused (Rellahan, 2020). While attempting to forcibly remove her from the vehicle, an officer's arm became entangled with hers as she drove away, dragging the officer 10 to 15 ft (*Pennsylvania v. Smith*, 2020). She then fled, driving at a high rate of speed, eventually being apprehended. After a three-day trial, she was convicted of aggravated assault (Rellahan, 2020).

#### 3.1. Gregory Lee Rodvelt

Some of the cases involving sovereign citizens attacks on LEOs are quite unusual and elaborate. Consider the case of Gregory Lee Rodvelt. In September 2018, law enforcement arrived at the scene of his home in Williams, Oregon. According to the affidavit, the team soon learned that Mr. Rodvelt had booby-trapped the property (*United States v. Rodvelt*, 2018). Upon arrival the officers approached a gate. They noticed a circular hot tub spa that was rigged in such a way that opening the gate would activate a mechanical trigger propelling the spa to roll towards the person opening the gate. Observers described the apparatus akin to something from the Indiana Jones movie *Raiders of the Lost Ark*. They also noticed another unusual apparatus on one of the overhead garage doors: a wooden mouse trap, rigged to discharge a shotgun blast if the garage door were to be lifted. Law enforcement then moved forward to gain entry into the property. Inside, they would find more booby-traps. Upon entry, they were surprised by a wheelchair rolling towards them. It then exploded and fired a shotgun shell that hit an FBI agent in the leg. The affidavit noted that Mr. Rodvelt had previously been arrested for domestic violence, DUI, aggravated assault, and possession of explosives and destructive devices. He had no felony convictions at the time of his latest incident.

#### 3.2. Victor White

In September of 2010, the local county sheriff and two employees of a petroleum company knocked on the door of Mr. White (CNN Wire Staff, 2010). They wanted to speak to him about an oil well on his property and inform him that the company owned mineral rights to his land (Mustian, 2010). Mr. White had been blocking the company's access roads and leaving notes expressing his unhappiness with the company using certain chemicals to kill weeds (Mustian, 2010). It was his view that they had been poisoning his water (Mustian, 2010). Upon seeing the deputy at his door, Mr. White began shooting, hitting the deputy three times and also hitting one of the company employees in the leg. Mr. White then stole the sheriff's police vehicle and taunted law enforcement over the police radio (CNN Wire Staff, 2010). Additional

LEOs arrived, and Mr. White then an officer who was part of the sniper unit. After setting his own home on fire, Mr. White surrendered. (CNN Wire Staff, 2010).

News reports indicate that Mr. White had a volatile history. He was attracted to guns at a young age (Mustian, 2010). He liked to practice quick drawing, once even shooting himself in the leg (Mustian, 2010). He joined the military and after his service, worked with his brothers as a pipe layer (Mustian, 2010). Eventually, he was hurt on the job and began living off the money he collected as part of a civil settlement from the injury (Mustian, 2010). Newspaper accounts indicate that he had been arrested in 1993 and charged with kicking in a door (Mustian, 2010).

It was also around that time that he began refusing to pay property taxes on his land. He complained to his family that drivers' licenses were "unconstitutional" and once pled guilty to driving without a license (Mustian, 2010). He was sued by the school district and other taxing entities. He responded by filing court documents containing various nonsensical antigovernment articles and a bumper sticker that read "fight organized crime, abolish the IRS" (Mustian, 2010). He would also visit the district's clerk's office, distributing flyers printed by the "Citizens Crime Commission" (Mustian, 2010). The flyers were meant to warn public officials about his contention that they were violating the law and would be standing trial for their crimes. The district's clerk's office hired a security guard and installed a panic button after Mr. White explicitly threatened to kill all of their lawyers. (Mustian, 2010). In a 2010 interview, while in jail after his arrest, Mr. White stated that he planned to retaliate against law enforcement via civil lawsuits and reiterated his hatred for law enforcement (Mustian, 2010). In December 2012, he was sentenced to life in prison plus 20 years (Vanderlaan, 2012).

Even in cases where no officer was harmed by sovereign citizens, deadly force was often intended. In March 2018, a vehicle in Minnesota slid off the road due to poor weather conditions. Troopers stopped to assist the two Moorish sovereign citizen occupants and soon learned that the vehicle had been reported stolen. As one of the troopers began to handcuff the male suspect, the female suspect held a 9 mm handgun to his head and pulled the trigger. The gun misfired and no bullet exited the chamber. The trooper acquired his weapon and shot the female suspect in the arm as she ran off. It was later learned she had an active arrest warrant for sex trafficking, along with a history of drug convictions (Delong & Sanchick, 2018).

In an unusual case involving a "free citizen," (another name for a sovereign citizen), a man refused to leave a mall parking lot. The police determined that he had a revoked driver's license and a warrant for his arrest. The situation escalated when he refused to leave his vehicle. Upon inspection, the police recovered "a device from the RV that was shaped like a pig and had '(expletive) the police' written on it. The pig held an energetic powder and appeared to be an explosive device" (Venzer, 2019). The man also specifically stated that he would kill multiple officers (Venzer, 2019). No one was harmed in the incident but the threat of harm explicitly directed at LEOs was ever present.

Such was the case with James Michael Tesi, a "natural living being," who referred to himself as Tesi El of the Moorish National Republic (Pitcavage, 2012). Mr. Tesi is thought to be the only known Caucasian Moor. He has a history of problematic interactions with police due to his belief in "sovereign freedom to travel." Additionally, he did not think it necessary to follow other traffic laws. He violated seat belt laws, speed limit laws and refused to pay his traffic tickets (Slater, 2016, p. 1). In his latest confrontation with police (July 2011) court records indicate that Mr. Tesi was driving, when police attempted to pull him over for outstanding warrants (*Tesi v. Texas*, 2014). Mr. Tesi swerved around the police vehicles and drove to his home and parked in his garage (*Tesi v. Texas*, 2014). Police approached Mr. Tesi who was still in his truck. Mr. Tesi kicked open his driver's side door, armed with a gun, and began firing at the officer. Gunfire was exchanged and Mr. Tesi was shot in the leg. The police officer was not hit but could have easily been killed or



seriously injured in the shootout.

In another instance that could have been deadly for law enforcement, an officer pulled over Mr. Lewis Pollard for multiple traffic violations. Upon approaching the vehicle, Mr. Pollard became aggressive and hostile, claiming he did not need a driver's license and that the officer had no authority to detain him. Mr. Pollard informed the officer that he would "recognize the authority of the Sheriff, only when the Sheriff began to recognize the Constitution" (Hautzinger, 2013, p. 5). The officer recognized Mr. Pollard as a sovereign citizen and called for backup. After the second officer arrived, Mr. Pollard drove away and went home. The police tracked the vehicle to his residence and knocked on his door. Mr. Pollard came outside, very upset and animated. Hidden behind his back was a loaded semi-automatic handgun. As he began to aim his firearm at officers, one officer quickly fired at Mr. Pollard, fatally wounding him. The District Attorney regarded their actions as exemplary and praised their ability to protect themselves and the community (Hautzinger, 2013). That the officers recognized Mr. Pollard as a sovereign citizen suggests that they had specialized training, were vigilant and had knowledge of the movement, possibly saving the officers' lives.

That same sentiment was expressed in the court testimony of a trooper about a routine traffic stop involving a sovereign citizen. On March 29, 2015, a state trooper pulled over two individuals after observing that the male passenger was not wearing a seatbelt. Immediately upon requesting identification, the passenger would only give his first and middle name, kept asking for the trooper's name and badge number and stated several times "I do not choose to loiter with you" (State of Minnesota v. Blanshan, 2017, p. 2). The passenger then buckled his seatbelt and locked the vehicle doors. The trooper immediately called for backup and when it arrived, the two occupants were forcibly removed from the vehicle. The scuffle with the sovereign citizen caused minor injuries to the trooper but the circumstances could have been much worse. In his testimony about the incident, the trooper explained that his training and experience allowed him to recognize the passenger as a sovereign citizen which "heightened [his] sense of security" and made him think about "what could potentially happen (State of Minnesota v. Blanshan, 2017, p. 4). His training might have saved his life.

Sovereign citizen deadly violence against LEOs, has also occurred during the course of an ambush. In this research, Table 1 reveals six instances in which LEOs were ambushed by sovereign citizens, leading to the death of eight LEOs, with an additional six LEOs wounded. Schouten and Brennan (2016) explain that there are two kinds of ambushes: entrapment and spontaneous. Entrapment ambushes involve a victim being lured into a trap and is predatory in nature. This style of attack can involve stalking LEOs as a group with the goal of an attack without choosing specific victims in advance (Schouten & Brennan, 2016). Spontaneous ambushes are crimes of opportunity and occur without much forethought (Schouten & Brennan, 2016). They are reactive and are triggered by the circumstances of the situation. All six ambush cases in this research were classified as entrapment. The perpetrators were intending to harm LEOs via directed, targeted violence.

Two well-known sovereign citizen cases of entrapment style ambushes are Gavin Long in Baton Rouge, Louisiana who shot six police officers, three of whom died, and Jered and Amanda Miller, who shot and killed two Las Vegas LEOs at a pizza restaurant. Evidence suggests both of those were well planned, targeted events meant to kill LEOs. The same can be said for the aforementioned case of Gregory Rodvelt, whose elaborate planning involved bombs and booby traps, designed explicitly to harm LEOs.

A final case example illustrates a lesser-known example of targeted violence against police by a sovereign citizen. Curtis Wade Holley intentionally set his house on fire before asking his neighbor to call 911 and thus lure first responders to the scene with the intention of killing them. (Etters, 2015). The first deputy on the scene was Chris Smith who was shot immediately upon arrival (Etters, 2015). Another officer was shot but survived because of his bulletproof vest.

People who knew Mr. Holley, reported that he had repeatedly spoken

about his intention to kill as many LEOs as possible. He was known to be volatile, to hate the government and to read propaganda online (Etters, 2015). An investigation revealed that two weeks prior to the shooting, Mr. Holley had explicitly threatened to shoot LEOs if they came to his residence (Rossman & Portman, 2014). The day before the shooting, his ex-girlfriend had called local authorities to report his threats (Etters, 2015). None of that information was shared with first responders (Rossman & Portman, 2014).

### 3.3. Threats to harm law enforcement

Table 2 documents 19 instances in which sovereign citizens threatened to harm law enforcement. Some sovereigns made threats in the course of an armed standoff or in elaborate plots designed to target law enforcement, some willing to die for their cause. David Allen Brutsche and Devon Campbell Newman, for instance, plotted to kidnap a LEO and hold their victim hostage in a makeshift jail. After the kidnapping, the duo planned to hold a trial and then "put a bullet in his head" (Powers, 2015, para. 6). "I'm willing to give my life for this" (Powers, 2015, para. 1). Undercover officers thwarted their plan before it could be carried out (Valley, 2013).

Some sovereigns brazenly contact law enforcement and explicitly threaten them via a phone call, private social media messaging or by posting it on public social media accounts. Such was the case for Michael Hall who was cited by the police for driving an unregistered and uninsured vehicle (Labella, 2018). He sent them private messages, putting the police "on notice" for their having violated his constitutional rights, writing that he will "travel freely upon any public road in any public highway I please until the day I die" and that he had "the right to kill a cop (Labella, 2018, para 2 and 3). In another instance, Mitchell Taebel, a known sovereign citizen with a long-troubled history, was arrested after leading law enforcement on a high-speed chase (Pohl, 2018). Two persons were severely injured, during the chase, when his vehicle slammed in to theirs. In a press conference, and on a number of other occasions, he stated, that the officers involved should have been killed and that he had the right to kill them under specific sections of the Uniform Crime Code (Pohl, 2018). His actions are in line with many sovereign citizens who often cite the U.S. Constitution or common law statutes that they interpret as supporting their antigovernment and anti-authority agendas.

## 4. Discussion

This article sought to provide an overview of sovereign citizens, summarize the empirical research about the movement and to explore the threat they pose to law enforcement. To date, there are relatively few studies of sovereign citizens. This may be due to the fact that very few were aware of this group before the year 2010, (M. Pitcavage, personal communication, February 1, 2018). Most of the research about sovereigns has been conducted by a small number of journalists and "watchdog" organizations.

In addition, sovereign citizens are not a monolithic or ideologically pure group. Their ideology oftentimes overlaps with other groups including militias, antigovernment groups, and patriot/white supremacy groups. Others with overlapping philosophies include the Black Panther party, scientology, anti-vaccination, dooms day preppers, and other movements. This complicates counterterrorism efforts that have traditionally "focus[ed] on leadership decapitation and targeting organizational logistics and finances..." (Hoffman & Ware, 2020, para.30). Sovereign citizens, like some other groups, are decentralized and have "...no identifiable leaders, no existing organization and no infrastructure to disrupt" (Hoffman & Ware, 2020, para.30) thus making identification and prevention a formidable task. Further complicating matters, is the lack of governmental authority to clarify issues of operational definition and ideology. Without such guidance, accurate accounting, especially among those without access to classified intelligence, becomes a greater challenge.

**Table 2**  
Sovereign citizens who threatened to harm law enforcement.

Date	State	Name	Circumstances
1. March 1998	Montana	LeRoy Schweitzer	Threatened federal officials
2. October 2007	New Hampshire	Ed Brown (and others)	Threatened, on a number of occasions, to kill federal and local law enforcement officials
3. April 2010	Washington	David Russell Myrland	Threatened officers during traffic stop, that if he was arrested, he would come to the home of the arresting officer, arrest him and use deadly force if needed
4. March 2011	Arkansas	Schaeffer Cox (and others)	Plotted to kidnap, kill law enforcement and government officials, called it the “2-for-1” plan
5. February 2012	California	Vahe Ohanion	Entered Sheriff’s station with a large camera, claiming diplomatic immunity, stating that the police had “five days’ notice to vacate.” After being escorted out, he said “I’m going to come back with a shotgun and snipe you.”
6. March 2013	Florida	Paul James Szaraz	Suspect with “enormous” amounts of weapons alarmed an acquaintance by talking about killing law enforcement officers
7. April 2013	Florida	Jason Kozdra	Suspect calls police and makes a death threat, repeats same threat upon their arriving at his home, says it is “his duty to kill government and police officers.”
8. May 2013	Louisiana	Brandon Gibbs	Made direct threat to any city employee; subsequently sent email to police warning them that “no trespassing would be tolerated” and to “stay away”
9. August 2013	Nevada	David Brutsche & Devon Newman	Plotted to torture and kill police officers
10. August 2014	Missouri	Olajuwon Ali Davis & Orlando Baldwin	Plotted to bomb public building, police vehicles and police
11. March 2015	Montana	William Wolf	Advocated a “shocking” level of violence towards law enforcement, and other public officials; had compared on webcast shooting police officers to shooting gophers; attempted to buy automatic shotgun allegedly to kill police
12. September 2015	West Virginia	Thomas Deegan	Threatened to overthrow West Virginia state government by targeting state capital, state police headquarters, Sheriff’s department, among others. Told followers “if the police arrive you should shoot them.”
13. January 2016	California	Todd Sloan	Had been posting Facebook threats against Sheriff’s office, the U.S. Bureau of Land Management and federal government buildings; later searched his residence and found several homemade bombs, incendiary devices and booby traps
14. August 2016	Indiana	Christopher Byrne	After being arrested for having bomb making materials in his car, police found that he had the addresses of several law enforcement officers and the judge involved in a previous legal case against him
15. August 2017	Georgia	Patricia Parsons	Plotted to kidnap judges and sheriff
16. January 2018	Arizona	Mitchell Taebell	After being arrested for multiple offenses, included a high-speed police chase in which multiple people were injured and stated during his arraignment hearing “officers can be killed under USC section 241 and 242. I just want to put that on record, and should be, in my opinion”; subsequently made similar comments at a personal press conference he held after his hearing
17. March 2018	Massachusetts	Michael Hall	Sent police private messages in which he said he had the “right to kill a cop who violates my constitutional rights when I am exercising them”
18. January 2019	North Carolina	Joshua Brandon Sydes	Threatened, on Facebook, to execute judge or law enforcement
19. January 2020	Louisiana	Justin Higdon	Threatened, on social media, to shoot police

Studies concerning the sovereign citizen movement thus far have largely focused on legal matters, mental health, radicalization, and postdiction of targeted violence. Emerging evidence suggests that most sovereign citizens are not delusional or mentally ill. Their behavior defies easy diagnostic categorization and requires further study. Their beliefs, though atypical in nature, are largely not indicative of disordered thought. Some sovereign citizens are motivated to commit violence for reasons that have yet to be fully explored. [Rahman et al. \(2019\)](#) have applied the concept of extreme overvalued belief to lone-actor terrorism and individual acts of targeted violence. Whether sovereign citizen ideology should be understood as an extreme, overvalued belief, will require more in-depth study. Understanding what motivates sovereign citizens could reveal important insights for developing prevention strategies.

Exploring the movement’s threat to law enforcement involved a collection of 94 instances in which sovereign citizens did harm police officers, attempted to harm them or threatened to do so. Violence aimed at police often began with routine traffic stops, where sovereigns were accused of violating basic traffic laws or had outstanding warrants. These stops were sometimes made worse by sovereigns fleeing the scene, thus escalating the situation. The findings of this research are consistent with other research indicating that most deadly far-right attacks on law enforcement are triggered by routine traffic stops ([Gruenewald et al., 2016](#)).

Sovereign citizen deadly violence against LEOs also occurred during ambushes. Though traffic stops are a large danger to LEOs, and often trigger sovereign citizen violence, the danger of an ambush is both real and deadly. The targeted attacks on LEOs, both those that were carried out successfully and those that were attempted but thwarted, highlight

the predatory capacity of the sovereign citizen movement.

## 5. Limitations and conclusion

Invariably, the descriptive nature of this analysis has limitations. The sample size, involving attacks and threats on LEOs, is too small to draw satisfactory conclusions. In addition, the data were collected from media-based reports, which are subject to errors and can lack completeness ([Huff-Corzine et al., 2014](#)). Without access to classified government data, media access, of this type, is often the only available information. Relatedly, despite a thorough and ongoing search, cases may have been missed. There may also have been cases that other researchers would have categorized differently. As mentioned above, some individuals were espousing sovereign citizen ideology but could have also been labeled as tax protestors or militias members, among others. Other researchers might have omitted those seemingly blended, crossover cases. For instance, Olajuwon David & Orlando Baldwin identified themselves as Moors but were simultaneously members of the New Black Panther Party.

This research took a conservative approach and only included cases where definitive sovereign ties were clear. An example of a case that was omitted was Martin Winters, leader of a doomsday survivalist group. Mr. Winters was arrested for illegally obtaining assault rifles and building bombs ([Sullivan & Ryan, 2014](#)). The FBI considered him an “extremely dangerous” individual who plotted to kill government agents, should they invade his property ([Masferrer, 2014](#)). One journalist labeled him a sovereign citizen but since his connection to the movement could not be independently verified, a decision was made to eliminate him from this sample of cases.

Despite its drawbacks, a descriptive approach can be valuable, especially given the limited empirical information available concerning sovereign citizens. Even more limited is the information available to guide law enforcement agencies, who do interact directly with sovereign citizens, in the course of routine police work (Gruenewald et al., 2016; Smith, 2019). Given LEO's regular contact with sovereign citizens, and the danger posed by sovereigns, the lack of mandated training programs, on this movement, is concerning (Smith, 2019). Some law enforcement agencies offer optional training. Such training should not be optional but instead mandatory and universal. Past training has likely saved the lives of many LEOs and could prevent future tragedies. Beyond training alone, additional measures are needed to combat the danger posed by the sovereign citizen movement. This danger is not limited to law enforcement but extends to public officials, and to society at large.

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